

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Javier Olmedo, on behalf of himself and all other employees similarly situated, Plaintiff v. Zaza Pas, Inc. and Conceta Donati, individually, Defendants.

Case No. 15-cv-3184
Judge Rowland

JOINT STIPULATION TO DISMISS

IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above entitled action, by their respective attorneys and/or otherwise, and pursuant to Fed. R. Civ. P. 41(a)(1), the following:

1. On November 17, 2015, the parties reached a settlement of the above-captioned action through a settlement conference.
2. The parties' settlement provides for a series of installment payments to be made by Defendants, with the final installment payment due on or before November 15, 2016.
3. The parties therefore stipulate that this matter shall be dismissed in its entirety, **without prejudice**, with each party incurring its own attorneys' fees and costs, except as otherwise provided for by the parties' settlement agreement.
4. On November 30, 2016, absent a motion by either party to enforce the settlement agreement, the dismissal of this matter shall convert automatically to a dismissal with prejudice.

Respectfully submitted,

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